



County of San Diego

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KATHLEEN A. FLANNERY
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January 30, 2018

Pat Brown,
7901 Von Karman Ave, #1050
Irvine, CA 92614

PROJECT NAME: JVR Solar Major Pre-Application

RECORD ID: PDS2017-MPA-17-016

PROJECT ADDRESS: Interstate 8 with Old Highway 80, within the Jacumba Community Planning area in the unincorporated area of San Diego County;

APNS: 614-100-20, 614-100-21, 614-110-04, 660-020-05, 660-020-06, 660-150-04, 660-150-07, 660-150-08, 660-150-10, 660-150-14, 660-150-17, 660-150-18, 660-170-09, 661-010-02, 661-010-02, 661-010-15, 661-010-26, 661-010-27, 661-010-30, 661-060-12, 661-060-22

TRUST ACCOUNT NO.: 2085587-D-05332

Dear Mr. Brown:

On January 12, 2018, Planning & Development Services (PDS) held a Pre-application Meeting on the above listed APN(s). This letter provides a summary of the major issues discussed at the conference, key decisions or determination, and guidance for project processing.

COMMUNITY PLANNING GROUP COORDINATION

Planning & Development Services (PDS) strongly recommends coordination with the Jacumba Community Planning Group prior to application submittal, as the Department will consider comments from applicable community groups in its decision making process. See the following links for a list of the Planning, Sponsor and Design Review Board chairpersons and contact information:

Planning and Sponsor Group: <http://www.sdcountry.ca.gov/PDS/docs/plngchairs.pdf>

**SDC PDS RCVD 11-16-18
GPA18-010, REZ18-007,
MUP18-022**

Plan Rural Regional Category, Rural Lands 40 (RL-40) and Specific Plan Area Land Use Designation, and zoned General Rural (S92), Open Space (S80), and Specific Plan (S88). The site is mainly undeveloped with some abandoned structures that propose to be removed. Access would be provided at Old Highway 80 and a secondary access from Carrizo Gorge Road (614-100-20, 614-100-21, 614-110-04, 660-020-05, 660-020-06, 660-150-04, 660-150-07, 660-150-08, 660-150-10, 660-150-14, 660-150-17, 660-150-18, 660-170-09, 661-010-02, 661-010-02, 661-010-15, 661-010-26, 661-010-27, 661-010-30, 661-060-12, 661-060-22)

Land Use Designation and Zoning:

CURRENT ZONING REGULATIONS	CONSISTENT?	
Use Regulation:	S80, S88, S92	Y, With approval of a GPA, Rezone, MUP
Animal Regulation:	W	N/A
Density:	1.7	N/A
Lot Size:	20AC/8AC/10,000SQ FT	N/A
Building Type:	C/L	N/A
Height:	G (35')	Y, With approval of a MUP
Lot Coverage:	N/A	N/A
Setback:	C/D	TBD
Open Space:	N/A	N/A
Special Area Regulations:	C	N/A

MAJOR PROJECT ISSUES

The following project issues were identified during the project pre-application scoping and are further discussed in the attachments to this letter. These issues may require substantial redesign of the proposed project or, if not resolved, would result in a recommendation for project denial by PDS. These issues discussed below, were identified based upon information presently available to the County and are subject to change upon submittal of further information and studies:

1. California Environmental Quality Act:

The proposed project appears to have the potential to result in significant direct and cumulative impacts under the California Environmental Quality Act (CEQA) and an Environmental Impact Report (EIR) will be required.

2. General Plan Amendment and Rezone:

The project is located with a Specific Plan Land Use Designation and is zoned Specific Plan. A solar farm project is considered a Major Impact Services and Utilities use pursuant to the County's Zoning Ordinance and is not permitted within a Specific Plan Land Use Designation. A General Plan Amendment and Rezone to change the land use designation and zoning is required

Solar panels could be a glare and glint hazard for aircraft in flight. The project must demonstrate that glare will not impact airspace safety. Recommendations for meeting this standard are described in Section 3.1.2 of the Federal Aviation Administration (FAA) Solar Guide. For off-airport projects, local governments, solar developers, and other stakeholders in the vicinity of an airport have the responsibility to inform the FAA about proposed projects so that the agency can determine if the project, specifically if large, presents any safety or navigational problems. A photovoltaic glint and glare study will be required. It is recommended that the applicant work directly with the County of San Diego Airport Staff with respect to the glint and glare study County Regional Airport Authority and subsequently attain the necessary Federal Aviation Administration (FAA) and State Division of Aeronautics approvals.

5. Visual Resources:

Based on an initial review, it appears that proposed project may adversely affect visual resources. Views from scenic vistas, scenic highways and County Scenic Routes will need to be analyzed further to determine the extent of any adverse impacts. Visual resources can include narrow or expansive views, views from one site or from a series of sites as along a scenic highway and views above, at eye level, or from below. A Visual Resources Study is required. The report should identify changes/modifications of the project from the original and provide mitigation and design considerations to reduce the visual impacts associated with this project. The recommended mitigation and design considerations should be incorporated into the project design.

6. Cultural Resources:

A cultural resources constraints analysis was completed by Dudek for the proposed project titled "Cultural Resources Constraints Analysis for the Jacumba Valley Ranch Solar Project, San Diego County, California," (November 2017). The constraints analysis consisted of a cultural records search that identified numerous cultural resources within the proposed project area. These resources include individual archaeological sites and the Jacumba Valley Archaeological District (JVAD). The JVAD has been determined eligible for listing in the National Register of Historic Places (NRHP); therefore, it is considered a significant resource under CEQA.

Major Project Issue: The current design of the proposed project may result in unmitigable significant impacts to cultural resources. Re-design is recommended to avoid any significant resources that are identified in the required cultural studies. As discussed in the constraints analysis, it should be noted that if any federal permits are required for the project, then Section 106 of the National Historic Preservation Act (NHPA) and consultation with the State Historic Preservation Officer regarding project effects to the district would also apply.

7. Biological Resources:

The project site contains wetlands and jurisdictional waters of the U.S./State, which are subject to the Resource Protection Ordinance (RPO) and permitting requirements of federal and state authorizing agencies as outlined below. The RPO prohibits impacts to RPO significant wetlands and wetland buffers as described in the Attachment.

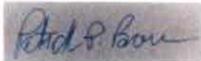
8. Fire Services Agreement:

This project, along with all other development, has a cumulative impact on the emergency services for this community. Due to the unique nature of the proposed project, additional equipment/staff/training will likely be necessary. To mitigate for this impact, the project will be required to participate in an emergency services agreement with the San Diego County Fire Authority. Please see project issue checklist for additional fire comments.

In addition to the issues outlined in this letter, it is strongly recommended that you contact other agencies to determine additional project requirements. The following link provides an Agency Contact List to assist in your due diligence efforts: <http://www.sdcounty.ca.gov/pds/docs/pds804.pdf>

To be filled out and signed by the financially responsible party:

I certify that I am the financially responsible party for the General Plan Amendment application, have reviewed and acknowledge the major project issues identified in this letter.



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baywa-re.com

Digitally signed by
patrick.brown@baywa-re.com
DN: cn=patrick.brown@baywa-re.com
Date: 2018.11.06 14:32:00 -0800

11/06/2018

Signature

Date

Patrick Brown

Print Name